

USA Comments – TAHSC October 2006 Report

Terrestrial Animal Health Standards Commission

October 2006 Report

GENERAL GUIDELINES FOR THE DISPOSAL OF DEAD ANIMALS

Article 3.6.6.1.

Introduction

The mass disposal of dead animals associated with an animal *disease outbreak* is often subject to intense public and media scrutiny thereby obligating the *Veterinary Administration* of a Member Country to not only conduct disposal operations within acceptable scientific principles to destroy the causative pathogen but also to address public and environmental concerns.

The guidelines in this Appendix are general in nature. The choice of one or more of the recommended methods should be in compliance with relevant local and national legislation and be attainable with the resources available. The guidelines should also be applied in conjunction with the procedures described for the killing of animals in Appendix 3.7.6.

Strategies for the disposal of dead animals (entire animals or parts thereof) should be prepared well in advance of any emergency. Major issues related to the disposal of dead animals include the number of animals involved, biosecurity concerns over the movement of infected or exposed animals, people and equipment, environmental concerns, and the psychological distress experienced by farmers and animal handlers.

Article 3.6.6.2.

Regulations and jurisdiction

The legislation regulating animal health and the organisation of the *Veterinary Administration* should give the *Veterinary Services* the authority and the legal powers to carry out the activities necessary for the efficient and effective disposal of dead animals. Cooperation between the *Veterinary Service* and other relevant government bodies is necessary to developing a coherent set of legal measures for the disposal of dead animals in advance of any emergency. In this context the following aspects should be regulated:

1. Powers of *Veterinary Services* (inspectors, veterinary officers, etc.) to effect controls and direct persons as well as the right of entry to an *establishment* for the *Veterinary Services* and associated personnel;
2. movement controls and the authority to make exemptions under certain biosecurity conditions, for example for transport of dead animals to another location for disposal;
3. the obligation on the involved farmer and *animal handlers* to cooperate with the *Veterinary*

Services;

4. any need to transfer the ownership of animals to the competent authority;
5. the determining of the method and location of disposal, and the necessary equipment and facilities, by the *Veterinary Services*, in consultation with other involved authorities including national and local governmental organisations competent for the protection of human health and of the environment.

Should the chosen option for the disposal of dead animals be applied near the border of a neighbouring country, the competent authorities of that country should be consulted.

Article 3.6.6.3.

Preparedness

The mass killing and disposal of animals in the event of a *disease outbreak* or disposal of animals in the event of natural disasters such as floods, usually must proceed with the minimum delay. The success is determined by the structures, policies and infrastructure established in advance:

1. Technical preparedness

Standard operating procedures (including documented decision-making processes, training of staff). A relationship with industry is essential to obtain compliance with animal health policies - farmer associations, commodity representatives, animal welfare organisations, support structures such as security services, relevant government agencies, the media and consumer representatives.

Comment [rlc1]: The 1st sentence is an incomplete sentence and needs additional language to complete the thought. The 2nd sentence does not seem to relate to the first sentence and, in fact, is not directly related to "technical preparedness." Perhaps this sentence should be a separate numbered item under a heading like "Industry relationships"?

2. Financial preparedness

Financial preparedness means a compensation or insurance mechanism, an access to emergency funding and an access to personnel through agreements with private veterinarians

3. Communication plan

Information sharing with officials involved in the *outbreak*, affected farmers, professional organizations, politicians and the media is essential. A well informed spokesperson should be available at all times to answer enquiries.

4. Resources

The management of resources should address such items as personnel, transport, storage facilities, equipment (such as mobile handling facilities for animals, disinfection equipment), fuel, protective and disposable material, and logistical support.

5. Heavy Special equipment

~~Heavy~~ Availability of special equipment includes trucks, tractors, bulldozers, and front-end loaders.

Critical elements

Critical elements which need to be considered in planning and implementation include: ~~The list of critical elements, which has not the pretension to be complete, needs to be taken into account in planning and implementation.~~

Deleted: taken into account

1. Timeliness

Early detection of new infections, immediate killing of infected animals and rapid removal of the dead animals with inactivation of the pathogen are important. Spread of the pathogen from the dead animals and their surroundings should be blocked as soon and as effectively as possible.

Comment [rlc2]: The timely killing of potentially infected animals is the most critical issue related to spread of pathogens. A dead animal is orders of magnitude less likely to spread the pathogen simply because respiration, defecation, etc., have been halted and reproduction of the pathogen has been greatly decreased or halted within the animal. So, speed in removal of a dead animal is an issue, but not nearly as important as "getting them dead" in the first place.

2. Occupational health and safety

Disposal should be organised in such a way that the workers are safeguarded against the risks of handling decomposing dead animals. Special attention should be given to zoonotic aspects. Workers should receive appropriate training and be sufficiently protected against infection with protective clothing, gloves, face masks, effective respirators, goggles, vaccination, and effective anti-viral medicines. Workers should also receive regular health checks.

Deleted: spectacles,

Deleted: anti viral

Deleted: and

3. Pathogen inactivation

The disposal procedure should be selected to result in inactivation of the pathogen.

Comment [rlc3]: This is most important for pathogens that are naturally difficult to inactivate, such as prions or spore-forming agents. For most other pathogens, method of disposal isn't as critical with regards to pathogen inactivation.

4. Environmental concerns

Different methods of the disposal of dead animals have different effects on the environment. For instance, pyre burning will produce smoke and smells; burial might lead to gas and leachate production resulting in potential and also a risk of contamination of air, soil, surface and sub surface water.

5. Availability of capacity

An assessment of capacities of different methods of disposal should be made prior to any emergency. Temporary storage of dead animals in cold stores may relieve a lack of processing capacity.

6. Inadequate funding

Adequacy of funding for the options chosen must be ascertained and committed at the earliest possible stage.

7. Staff resources

For extended and /or large operations. Particularly important for technical and inspection personnel who are usually in short supply.

Deleted: inspectorial

7.8. ~~Public reaction~~ Societal acceptance

Societal acceptance is an important point in choosing a disposal method.

Deleted: the method to use.

8.9. Acceptance by farmers

Producers will be sensitive to the safety measures taken to prevent spread of the disease by disposal method selected and the transport of the dead animals to the disposal site. Adequate compensation of owners for the loss of animals or for burial or burning sites will improve acceptability.

Deleted: Farmers

9.10. Equipment

Equipment used in the disposal of dead animals can transfer infection to other premises. The cleaning and disinfection of the outside surfaces of equipment such as cranes, containers and trucks, and the departure of vehicles from the farm should receive special attention. Trucks transporting dead animals should be leak proof.

10.11. ~~Wildlife~~ Scavengers and vectors

When disposing of dead animals, full attention should be given to preventing scavengers and vectors gaining access to dead animals, which might cause spread of disease.

12. Economic impact (short and long term including recovery)

The method of disposal has the potential to influence significantly many aspects economically. This excludes operational costs, subsequent monitoring and re-establishment.

Deleted:

Article 3.6.6.5.

Practical considerations

1. Selection of disposal site

Sufficient top soil to cover the site; water drainage; prevailing wind conditions; easy access to transport; availability of meteorological data; separation from sensitive public sites, and the effect on future use.

2. ~~Selection of~~ Contractors for transport

~~Selection of e Contractors for transport~~ — availability; can they supply in all the needs; exclusive use of vehicles or would they also be used for other purposes (risk of disease transmission); access to available roads; suitable for the purpose to be used.

3. Logistical preparedness for the appropriate technology

Availability of fuel (~~wood, old tyres~~); sufficient manual labour available; sites and availability of disinfection tents for personnel; storage and disposal of protective clothing; housing for personnel to minimise the spread of infection; facilities for entry and exit control; availability of electricity for night operations; personal facilities for personnel such as toilets, drinking water; availability of communication — mobile phone reception; protection (e.g. vaccination) of personnel; rendering capacity at rendering plants; ~~arms and ammunition~~ ~~arms and ammunition~~; additional cold storage and holding facilities at rendering plants and abattoirs.

Comment [mjd4]: We believe this language should be retained to allow for this option and ensure that the competent authorities are properly prepared should the event arise.

4. Procedures and policies for disposal of other possibly contaminated products

Animal products such as litter, Manure, wool, eggs and milk; non-animal products; animal feed; non-animal products such as protective clothing.

5. Wildlife

Need to address risk posed; expertise availability for ~~h~~azing of wildlife.

Article 3.6.6.6.

Comment [rlc5]: “hazing” rather than capture/culling? If carried out properly, disposal should never necessitate capture or culling of wildlife. Suggesting culling of wildlife is not something that OIE should be suggesting.

Deleted: capture/culling

Recommended methods for the disposal of dead animals

The method(s) chosen should be based on local conditions and ~~circumstances~~ the required capacity and speed of outcome.

Some of the methods below may require on-farm pre-processing prior to transportation of dead animals to central facilities for rendering or incineration. Pre-processing could include the grinding of dead animals which can then be transported in sealed containers, or be subjected to fermentation, composting or freezing.

1. Rendering

This is a closed system for mechanical and thermal treatment of animal tissues leading to stable, sterilized products, e.g. animal fat and dried animal protein. The technology exists in dedicated facilities. It produces an effective inactivation of all pathogens with the exception of prions where infectivity is reduced. The availability of the capacity should be determined in advance.

2. Incineration in a dedicated facility

In such a facility, whole dead animals or parts of animals can be completely burned and reduced to ash, often in conjunction with other substances (such as municipal waste,

hazardous waste or hospital waste). Effective inactivation of pathogens, including spores, occurs. Fixed facility incineration is wholly contained and has some advantages from the environmental viewpoint as the exhausts may be fitted with afterburner chambers to completely burn hydrocarbon gases and particulate matter from the main combustion chamber.

3. Rendering and incineration

These may be combined for improved security and to provide additional fuel for furnaces in facilities used for other purposes such as in cement kilns and electricity generation plants.

4. Air curtain incineration

This process fan-forces a mass of air through a manifold, thereby creating a turbulent environment in which incineration is accelerated up to six times for example in a burn-pit. The equipment can be mobile and, because it can be used on site, there is no requirement for transportation of the animal material. It also produces effective inactivation of pathogens.

5. Pyre burning

This open system of burning dead animals is a well established procedure that can be conducted on site with no requirement for transportation of animal material. However, it takes an extended period of time and has no way of verifying pathogen inactivation, and there may be particulate dissemination from incomplete combustion. Further, because the process is open to view, there may be a lack of acceptance by the public.

6. Composting

Composting is a natural biological decomposition process that takes place in the presence of oxygen. In the first phase, the temperature of the compost pile increases, organic materials break down into relatively small compounds, soft tissue decomposes, and bones soften partially. In the second phase, the remaining materials, mainly bones, break down fully to a dark brown or black humus containing primarily non-pathogenic bacteria and plant nutrients. However, some viruses and spore forming bacteria, such as *Bacillus anthracis*, and other pathogens such as *Mycobacterium tuberculosis* may survive.

7. Trench & Burial

In this method, whole dead animals are buried and covered by soil. Burial is an established procedure which may be conducted on site. It may not inactivate all pathogens. In some circumstances, dead animals may be disposed of by mounding whereby they are covered by a layer of soil above ground.

8. Biogas production

This is a closed system of anaerobic fermentation which would require for the disposal of dead animals or their parts prior mechanical and thermal treatment of the input material (such as the liquid product of rendering plants). This process may not inactivate all pathogens.

9. Alkaline hydrolysis

This method uses sodium hydroxide or potassium hydroxide to catalyse the hydrolysis of biological material into a sterile aqueous solution consisting of small peptides, amino acids, sugars, and soaps. Heat is applied (150°C) to accelerate the process. The only solid byproducts are the mineral constituents of bones and teeth. This residue (2% of the original weight of the animal) is sterile and easily crushed into a powder. The temperature and alkali conditions of the process destroy the protein coats of viruses and the peptide bonds of prions. Both lipids and nucleic acids are degraded. The process is carried out in an insulated steam-jacketed, stainless steel pressure vessel.

10. Bio-refining

This is a high pressure, high temperature hydrolytic process, conducted in a sealed pressurised vessel. The waste material is treated at 180°C at 12 bar pressure for 40 minutes, heated by the indirect application of steam, other compostable material, paper and comparable materials, and cereal straws either alone or in combination. The process inactivates all microbiological agents.

11. Dead animal disposal at sea

International Conventions define the conditions to be met for the disposal of dead animals at sea.

Guidelines for decision-making for the disposal of dead animals

~~Strategies for dead animal disposal require preparation well in advance of an emergency in order to maximize the efficiency of the response. Major issues related to dead animal disposal can include the number of animals involved, bio security concerns over movement of infected and exposed animals, people and equipment, environmental concerns, and the extreme psychological distress and anxiety experienced by producers and emergency workers.~~

The disposal of large numbers of dead animals will be expensive. As well, fixed and variable costs will vary with the choice of the disposal method. Each method used will result in indirect costs on the environment, local economies, producers, and the livestock industry. Decision makers, in addition to biosecurity considerations, need to understand the economic, social and aesthetic impact of various disposal technologies.

A disposal option hierarchy may be incapable of fully capturing and systematizing the relevant dimensions at stake, and decision makers may be forced to consider the least preferred means. It therefore requires a comprehensive understanding of any array of dead animal disposal technologies and must reflect a balance between the scientific, economic, and social issues at stake. Timely slaughter, maintenance of security and prevention of further spread of disease, are the essential considerations in terms of disease control.

The following is an example of a possible process for aiding decision-making by comparing the suitability of various disposal options against factors that are considered important for the specific disposal event in question:

1. Step 1 - Define the factors to be considered. Include all relevant factors and allow enough flexibility to permit modifications for different situations and locations. Examples of possible factors include operator safety, community concerns, international acceptance, transport availability, industry standards, cost effectiveness and speed of resolution. These factors can be modified or changed, as is shown in the following example, to best fit the situation of event involved.
2. Step 2 - Assess the relative importance of the factors by weighting each on their considered importance to addressing the event in question. The sum of all the weightings, regardless of the number of factors, must total 100.
3. Step 3 - Identify and list all disposal options under consideration. Rate each disposal option against each factor and assign a Utility Rating of between 1 to 10 to each comparison. The Utility Rating (U) is a number between 1 and 10 which is allocated according to how well the option achieves the ideal with respect to each factor (eg 1 = the worst possible fit, and 10 = the best fit).
4. Step 4 - For each factor and each disposal option, multiply the Factor Weight (F) x Utility Rating (U) to yield a numeric Balanced Value (V), (eg $V = F \times U$).
5. Step 5 - By adding the Balanced Values to a sum for each disposal option, it is possible to compare the suitability of disposal options by numerically ranking the sums of the Balanced Values for each disposal option. The largest sum would suggest that disposal option is the best balanced choice.

An example of the use of this process follows in Table 1. In this example, rendering achieved the highest sum and would be considered as the best balanced choice and the most suitable disposal option for the factors considered.

Table 1: **Decision Making Process**

Method		Rendering		Fixed Incineration		Pyre Burning		Composting		Mass Burial		On-Farm Burial		Commercial Landfill	
	Weight	Utility	Value	Utility	Value	Utility	Value	Utility	Value	Utility	Value	Utility	Value	Utility	Value
Factors															
Operator Safety	20	7	140	4	80	8	160	3	60	7	140	8			
Speed of Resolution	20	8	160	8	160	2	40	5	100	5	100	6			
Pathogen Inactivation	15	10	150	10	150	8	120	5	75	4	60	4			
Impact on Environment	10	10	100	8	80	3	30	10	100	3	30	3			
Reaction of the Public	10	10	100	7	70	1	10	9	90	3	30	4			
Transport Availability	5	1	5	1	5	8	40	5	25	3	15	8			
Acceptable to Industry	5	7	35	7	35	7	35	7	35	6	30	7			
Cost	5	4	20	1	5	6	30	9	45	8	40	9			
Risk to Wildlife	5	10	50	10	50	5	25	4	20	5	25	5			
Capacity to Meet Requirements	5	5	25	3	15	9	45	9	45	9	45	9			
Total Weight to Equal 100 Units	100	sum	785	sum	650	sum	535	Sum	595	sum	515	sum		sum	